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Attorneys for Defendants
Netflix, Inc., and
Netflix Worldwide Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX
WORLDWIDE ENTERTAINMENT,
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**DECLARATION OF MARVIN S.
PUTNAM IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

Date: September 3, 2024
Time: 9:00 a.m.
Place: Courtroom 850

Hon. R. Gary Klausner

DECLARATION OF MARVIN S. PUTNAM

I, Marvin S. Putnam, declare as follows:

1. I am an attorney duly licensed to practice before this Court. I am a partner at the law firm of Latham & Watkins LLP (“Latham”), and attorney of record for defendants Netflix, Inc. and Netflix Worldwide Entertainment, LLC (collectively, “Defendants” or “Netflix”). I have personal knowledge of the facts stated in this declaration, and if called to testify as a witness, would and could competently do so. I respectfully submit this declaration in support of Defendants’ Motion to Dismiss.

2. On May 9, 2024, Fiona Harvey (“Harvey”) gave an interview on *Piers Morgan Uncensored*. The interview was 54 minutes and 43 seconds in length and has received over 14 million views to date.

3. A true and correct copy of a screen capture of the YouTube page for Harvey’s May 9, 2024 interview on *Piers Morgan Uncensored*, accessed on July 27, 2024, is attached hereto as **Exhibit A**.

4. A true and correct copy of the article titled “MP wife’s stalker; lawyer Laura tells of fired trainee’s hate campaign” (McPherson, Lynn; *Sunday Mail*, January 30, 2000; <https://www.thefreelibrary.com/MP+WIFE%27S+STALKER%3B+Lawyer+Laura+tells+of+fired+trainee%27s+hate...-a061570268>, last accessed July 23, 2024) is attached hereto as **Exhibit B**.

5. A true and correct copy of the article titled “I’VE GOT A LONG WRRAY TO GO YET; MP Jimmy Wray talks for the first time about his stroke, his family and the condition that blights his littleboy’s progress” (Brown, Annie; *Daily Record*, March 3, 2004; <https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY+TO+GO+YET%3B+MP+Jimmy+talks+for+the+first+time...-a0113836577>, last accessed July 23, 2024) is attached hereto as **Exhibit C**.

6. A true and correct copy of the article titled “‘Real-life’ Baby Reindeer stalking Fiona Harvey was on police watchlist over ‘sinister’ campaign against Sir Keir Starmer” (Sullivan, Mike; *The Sun*, May 20, 2024; <https://www.thesun.co.uk/news/28035155/fiona-harvey-police-watchlist-keir-starmer-emails/>, last accessed July 23, 2024) is attached hereto as **Exhibit D**.

7. A true and correct copy of the article titled “Baby Reindeer fans float theory that Richard Gadd’s stalker ‘Martha Scott’ might have been a man in real life – as they point out all the clues in the hit Netflix series” (Taylor, Jessica; *MailOnline*, April 23, 2024; <https://www.dailymail.co.uk/femail/article-13339871/Baby-Reindeer-fans-float-theory-Richard-Gadd-stalker-Martha-Scott-man-real-life-point-clues-hit-Netflix-series.html>, last accessed July 27, 2024) is attached hereto as **Exhibit E**.

8. A true and correct copy of the article titled “Baby Reindeer: Has Richard Gadd’s real stalker been revealed?” (Phillipson, Daisy; May 1, 2024; <https://www.dexerto.com/tv-movies/baby-reindeer-has-richard-gadd-real-stalker-revealed-2655346/>, last accessed July 23, 2024) is attached hereto as **Exhibit F**.

9. A true and correct copy of the article titled “Labour inquiry follows selection meeting” (*The Herald*, September 5, 2000; <https://www.heraldscotland.com/news/12163265.labour-inquiry-follows-selection-meeting/>, last accessed July 23, 2024) is attached hereto as **Exhibit G**.

10. A true and correct copy of the Series is being provided to the Court for ease of reference pursuant to the notice of lodging.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of July, 2024 in North Haven, Maine.

Dated: July 29, 2024

By: /s/ Marvin S. Putnam
Marvin S. Putnam